

October 7, 2021

Hon. Danny Bickell, Deputy Clerk Supreme Court of the United States Office of the Clerk 1 First Street, N.E. Washington, D.C. 20543

RE: Naim Rasool Muhammad v. Texas, No. 21-5420 (Capital Case)

Dear Mr. Bickell,

Respondent respectfully requests a thirty-day extension of time, until November 19, 2021, to file a brief in opposition in the above-styled case. Respondent's current deadline, with one extension, is October 20, 2021.

This request is not intended to unnecessarily delay the proceeding. Respondent requests this extension because, due to time expended on undersigned counsel's capital cases (including preparation of 18 boxes of files for discovery), non-capital cases (including preparation for oral argument in the Fifth Court of Appeals at Dallas on October 12, 2021), and other work-related obligations, undersigned counsel needs additional time to complete the brief in opposition and sufficiently address Mr. Muhammad's issues.

Petitioner Naim Muhammad's counsel, Benjamin Wolff, has advised he has no objection to this request for an extension. I appreciate your consideration of this matter.

Respectfully,

/s/ Jaclyn O'Connor Lambert

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